

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WINIFRED BLACKLEDGE

Plaintiff,

vs.

**ALABAMA DEPARTMENT OF
MENTAL HEALTH & MENTAL
RETARDATION & COMMISSIONER
JOHN HOUSTON, in his Official
Capacity as Commissioner.**

Defendants.

CASE No.: CV 2:06-CV-321-ID

PLAINTIFF'S REQUESTED VOIR DIRE QUESTIONS

Plaintiff requests the Court to ask the following questions during its voir dire examination of the jury panel:

1. Do any of you know the plaintiff, in this case - Winifred Blackledge?
2. Do any of you know any of the following people who may be witnesses in this case?
Luella Rebecca Green; Roy Jackson; Dr. Susan Blanchard; Susan Stuardi; Jerryln London; Kendra Butler; Eranell McIntosh-Wilson; Fordyce Mitchell; Henry Ervin; Bernice Williams-Kimbrough; Eddie Abdulhaqq; John Houston; Mildred "Mickey" Groggel; Melissa Ezell; Sherrita Williams; James Packer; Marilyn Benson; June Lynn; Bobby Ross; Daphne Rosalis; Kathy Sawyer; Shirley Patterson; and Donna Buckley.

3. Have any of you or your family ever been an employee of the State of Alabama of the State of Alabama Department of Mental Health and Retardation?
4. Have any of your family members suffered from mental retardation or mental illness?
5. Do any of you or your family members receive or have received services from the Alabama Department of Mental Health and Retardation?
6. Have any of you or your family members ever worked with a company that provides/provided services to the Department of Mental Health and Retardation or its clients?
7. Have any of you or your family members ever worked for a company that provides/provided services to individuals or their families suffering from mental retardation or mental illness?
8. Have any of you ever been represented by Rocco Calamusa, Jr. or Joshua D. Wilson or the law firm of Wiggins, Childs, Quinn & Pantazis, LLC., located in Birmingham, Alabama?
9. Have any of you ever been represented by Courtney W. Tarver, Deputy Attorney General and General Counsel for the Alabama Department of Mental Health and Mental Retardation, or Rebecca Luck, attorney for the Alabama Department of Mental Health and Mental Retardation, or Troy King, the Attorney General, or any attorney from the Attorney General's office?
10. Is there anyone here who for any reason does not feel that he or she can sit and decide this case without prejudice to one side or the other?
11. Have any of you ever held a position which gave you the authority to hire, promote,

fire, layoff, or make other personnel decisions?

12. Have any of you or your spouse ever owned your own business?
13. Have any of you ever been involved in a charge of discrimination that was made at your place of employment or at the Equal Employment Opportunity Commission?
14. Have any of you ever been accused of discrimination or harassment or accused someone else of discrimination or harassment?
15. Is there anyone here who believes he or she will feel uncomfortable sitting on this case because it is a discrimination case involving race discrimination?
16. Does anyone think that the lawmakers have gone too far in making laws to regulate how people are treated at work based on their race?
17. Does anyone have a Master's Degree and, if so, in what field?
18. Does anyone believe that employment decisions made by employers should not be challenged in Court?
19. Does anyone hold the belief that employers should be allowed to make any employment decision regardless if it violates federal discrimination laws?
20. Have you ever before participated in a trial, whether as juror, witness, party, court officer, attorney, or attorney's employee?
21. Have you or any members of your family ever responded to a Charge of Discrimination or provided an agency with information in connection with a Charge?
22. Have you or any members of your family ever been a victim of discrimination on account of race?
23. Is there anyone here who, if the evidence so warrants, will have difficulty awarding

damages against defendant, State of Alabama Department of Mental Health and Retardation?

24. Does anyone here have any opposition to people receiving financial compensation for emotional and psychological trauma they have suffered on account of discrimination?

Respectfully submitted,

/s/ Joshua D. Wilson
Rocco Calamusa, Jr.
Joshua D. Wilson
Attorneys for the Plaintiff

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203
205/314-0500

CERTIFICATE OF SERVICE

I do hereby certify that on this the 11th day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

TROY KING
ATTORNEY GENERAL

COURTNEY W. TARVER
Deputy Attorney General and General Counsel
State of Alabama Department of
Mental Health and Mental Retardation
RSA Union Building
100 N. Union Street
P.O. Box 301410
Montgomery, Alabama 36130-1410
Phone: (334) 242-3038
Fax: (334) 242-0924

/s/ Joshua D. Wilson
OF COUNSEL